

Exhibit A



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LANGUAGE INTERPRETERS

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BILLINGS DIVISION

TRACY CAEKAERT, and CAMMILLIA
MAPLEY,
Plaintiffs,
v.

Cause No. CV-20-52-

BLG-SPW

WATCHTOWER BIBLE AND TRACT SOCIETY
OF NEW YORK, INC., WATCH TOWER
BIBLE AND TRACT SOCIETY OF
PENNSYLVANIA, and BRUCE MAPLEY SR.,
Defendants.

WATCHTOWER BIBLE AND TRACT SOCIETY
OF NEW YORK, INC.
Cross-Claimant,
v.
BRUCE MAPLEY SR.,
Cross-Claim Defendant.

ROUGH DRAFT
VIDEOTAPED REMOTE DEPOSITION
CAMILLIA MAPLEY

TAKEN ON
WEDNESDAY, NOVEMBER 30, 2022 (TUESDAY, NOVEMBER 29,
2022)
5:12 A.M. AEDT (11:12 A.M. MST)

WORKSPACE - LEVEL 5
171 COLLINS STREET
MELBOURNE, 3000 AU



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Q. You have recently dismissed your claims
against Bruce Senior, do I have that right?

MR. SHAFFER: Object to form. Her lawyers
did that. That's correct. That's what the record
will reflect.

BY MR. SWEENEY:

Q. Cami, are you aware of that?

A. Yes.

1 Q. Can you tell me why?

2 A. No, I don't know.

3 Q. And you don't --

4 A. That's for -- I'm not the legal team.

5 Q. Why did you sue Bruce Senior in the first
6 place?

7 MR. SHAFFER: Object to form. Cami hired
8 lawyers to take wha thappened to her, what she
9 recited happened to her and put that inbto legal
10 papers and filed them on her behalf, so if you're
11 asking her for the strategic reasoning behind her
12 lawyers' decisions, I think that's an improper
13 question.

14 MR. SWEENEY: I think your comments are
15 improper, Ryan. My question is direct. She sued
16 Bruce Mapley Senior. I'm asking her why.

17 MR. SHAFFER: Same objection.

18 BY MR. SWEENEY:

19 Q. You can answer, Cami.

20 A. Because he sexually abused me.

21 Q. Then why have you now dismissed your
22 claims against Bruce Senior?

23 MR. SHAFFER: Same objection.

24 BY MR. SWEENEY:

25 A. And my answer is, is that's the lawyers'

1 decision.

2 Q. Did you reach a settlement with Bruce
3 Senior?

4 A. I have no contact with the man.

5 Q. I appreciate that, but do you know if you
6 have entered into a settlement agreement with Bruce
7 Senior?

8 A. If I hav no contact, I have no contact.
9 How can I settle an agreeennt with him?

10 Q. Do you know if you have released him from
11 being liable for the allegations in your complaint?

12 A. I have no idea.

13 Q. And I think you're testifying that you
14 don't know if you entered into a written settlement
15 agreement with Bruce Senior, is that accurate?

16 MR. SHAFFER: Object to form. She said --

17 BY MR. SWEENEY:

18 A. I never said I --

19 Q. All right.

20 A. I never said I didn't know.

21 MR. SHAFFER: Misstates her testimony.

22 BY MR. SWEENEY:

23 Q. I'll ask you then, have you entered into a
24 written settlement agreement with Bruce Senior?

25 A. No.

1 Q. Is your testimony today that you have no
2 idea why he has been dismissed from this lawsuit?

3 MR. SHAFFER: Asked and answered.

4 BY MR. SWEENEY:

5 A. Once again, that is for my lawyers to make
6 decision about what's happening.

7 Q. And I appreciate that, Cami. I'm asking
8 about your personal knowledge. Do you know why he
9 was dismissed from this lawsuit?

10 MR. SHAFFER: Cami, don't answer that.
11 You and I have talked about that. He's not allowed
12 to ask you that question.

13 MR. SWEENEY: Well, Ryan, she doesn't get
14 to insulate testimony simply by bringing it up with
15 you. If she knows why a person she'd sue has been
16 dismissed, she has to tell me that.

17 MR. SHAFFER: If she knows why her lawyers
18 dismissed Bruce Mapley, she has to tell you that? I
19 disagree. Cami, don't answer the question.

20 MR. SWEENEY: Well, Ryan, this is not your
21 lawsuit. This is hers. She sued Bruce. She
22 dismissed Bruce. I'm going to ask her why.

23 If the answer is she doesn't know, she can
24 tell me that, but I don't think she gets to hide
25 behind attorney/client privilege for why she named

1 somebody as a defendant or why she dismissed them.

2 **MR. SHAFFER:** Her testimony has been
3 clear. She left that to her lawyers to decide. Her
4 lawyers decided it. You're asking her now to get
5 into what her lawyers told her as about why her
6 lawyers dismissed Bruce Mapley, I believe that's
7 getting into attorney/client privilege
8 communication. I'm not going to let her answer it.

9 **BY MR. SWEENEY:**

10 **Q.** Cami, do you think Bruce Senior should
11 still be a defendant in this lawsuit?

12 **A.** Well, his name's still on it, so isn't he?

13 **Q.** He has been dismissed by order of court,
14 so inaccurately his name was represented as being in
15 the caption, but the claims have been dismissed, to
16 clear that up for you.

17 **A.** Well, I think the truth should come out,
18 and that's what our goal is here, isn't it?

19 **Q.** And I appreciate that, but my question is:
20 Do you think Bruce Senior should still be a
21 defendant in this lawsuit?

22 **A.** Don't know.

23 **Q.** How did you know Gunner Haines?

24 **A.** He was in the congregation.

25 **Q.** When did Gunner pass away?